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The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE UNIVERSITY OF WASHINGTON, et

al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, et al.,

Defendants.

No. 2:18-CV-01396-BJR

**STIPULATION AND ORDER
REGARDING DEFENDANT
ICE'S PRODUCTION OF
FORMS I-213**

STIPULATION

Plaintiffs THE UNIVERSITY OF WASHINGTON, the CENTER FOR HUMAN
RIGHTS AT THE UNIVERSITY OF WASHINGTON, and ANGELINA GODOY
(collectively “the UWCHR”), and Defendant IMMIGRATION AND CUSTOMS
ENFORCEMENT (“ICE”) hereby stipulate that ICE will complete the items delineated below
to resolve the parties’ dispute over UWCHR’s FOIA Request ICE0010, ICE FOIA tracking
number 2018-ICFO-14208, which sought “Copies of Form I-213 (‘Record of
Deportable/Inadmissible Alien’) created on or after January 1, 2012 for each individual
detained or taken into custody by staff from ICE’s Seattle field office [and] each individual
transferred to the custody for staff from ICE’s Seattle field office by CBP, or by state or local
law enforcement officials.” *See* ECF No. 1, ¶ 49. UWCHR reserves the right to challenge the

ORDER - 1

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1 propriety of redactions or other withholdings on summary judgment after reviewing ICE's full
 2 production.

- 3 1. ICE will produce all Forms I-213 for the Seattle Area of Responsibility (AOR)
 4 for the period of January 1, 2019 through March 31, 2020;
- 5 2. ICE will process and produce 500 pages of the Forms I-213 on May 8, 2020.
 6 Thereafter, ICE will process and produce 2,000 pages of the Forms I-213 on the
 7 8th of each subsequent month (or the next business day if the 8th falls on a
 8 holiday or weekend) until ICE has produced all Forms I-213 for the Seattle
 9 AOR for the period of January 1, 2019 through March 31, 2020;
- 10 3. ICE will produce an updated spreadsheet reflecting the same information as a
 11 spreadsheet ICE previously produced to UWHCR containing the following
 12 pages and fields:
 - 13 a) Summary Page: This page of the spreadsheet will show:
 - 14 i) total Enforcement and Removal Operations' (ERO)
 15 administrative arrests for the Seattle area from January 1,
 16 2012 to March 31, 2020;
 - 17 ii) total ICE initial book ins for the Seattle area from January
 18 1, 2012 to March 31, 2020; and
 - 19 iii) total ICE removals for the Seattle area from January 1,
 20 2012 to March 31, 2020.
 - 21 b) Arrests Page: This page of the spreadsheet will show the following fields
 22 for ERO's administrative arrests for the Seattle AOR (subject to ICE
 23 redactions) from January 1, 2012 through March 31, 2020:
 - 24 i) Arrest date;
 - 25 ii) Date of birth;
 - 26 iii) Gender;
 - 27 iv) County of citizenship;

- 1 v) Event number;
- 2 vi) Apprehension landmark;
- 3 vii) Arrest method;
- 4 viii) Most serious conviction.

5 c) Book Ins Page: This page of the spreadsheet will show the following
6 fields for initial book ins for the Seattle AOR (subject to ICE redactions)
7 from January 1, 2012 through March 31, 2020:

- 8 i) Book in date;
- 9 ii) Date of birth;
- 10 iii) Gender;
- 11 iv) County of citizenship;
- 12 v) Detention facility;
- 13 vi) Apprehension method;
- 14 vii) Most serious conviction.

15 d) Expedited Removals Page: This page of the spreadsheet will show the
16 following fields for expedited removals for the Seattle AOR (subject to
17 ICE redactions) from January 1, 2012 through March 31, 2020:

- 18 i) Departed date;
- 19 ii) Date of birth;
- 20 iii) Gender;
- 21 iv) County of citizenship;
- 22 v) Event number;
- 23 vi) Most serious conviction;
- 24 vii) Case category.

25 e) Other Removals Page: This page of the spreadsheet will show the
26 following fields for other removals for the Seattle AOR (subject to ICE
27 redactions) from January 1, 2012 through March 31, 2020:

- 1 i) Departed date;
- 2 ii) Date of birth;
- 3 iii) Gender;
- 4 iv) County of citizenship;
- 5 v) Event number;
- 6 vi) Most serious conviction;
- 7 vii) Case category.

8 DATED this 4th day of May, 2020.

9 Davis Wright Tremaine LLP
10 Attorneys for Plaintiffs

Brian T. Moran, United States Attorney
10 Attorneys for Defendants

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22 **ORDER**

23 IT IS SO ORDERED this 7th day of May, 2020.



24
25 The Honorable Barbara J. Rothstein
26 United States District Court Judge
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